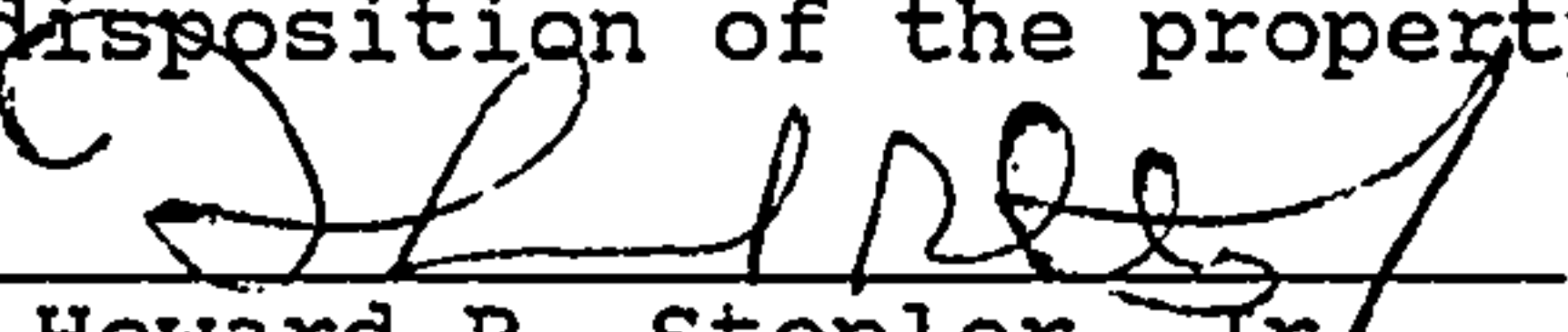


The voluntary transfer e.g. sale, gift, inheritance of property from one adverse holder to another adverse holder enables, the second adverse holder to tack i.e. combine the period of his adverse occupancy, with the period of adverse occupancy of the first adverse holder. Freed v. Cloverlea Citizens Association 246 Md 288, 228 A.2nd 421 (1967).

In this case it is clear that the Plaintiff and her predecessors have adversely possessed the property for well beyond the statutory period of twenty (20) years. The Plaintiff herself has possessed the property since 1962. Further, plaintiff has met all the conditions set forth in Section 14-108 of the Real Property Article, Maryland Annotated Code, and therefore is entitled to a declaration quieting title to the property by virtue of her and her predecessors actual peaceful possession of the property whether under color of title or claim of right.

For the foregoing reasons Plaintiff submits that her Motion for Summary Judgment be granted and that this Court should enter an Order Quieting Title to the Property and declaring that the Plaintiff has good and marketable fee simple title to the property, absolute ownership of the property and the right of disposition of the property.


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